

EXHIBIT 1

Tanner J. Bean (A17128)
tbean@fabianvancott.com
Jacqueline M. Rosen (A18530)
jrosen@fabianvancott.com
FABIAN VANCOTT
95 South State Street, Suite 2300
Salt Lake City, UT 84111-23323
Telephone: (801) 531-8900
Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

BRIDGER LEE JENSEN, an individual;
SINGULARISM, a non-profit corporation;
PSYCHE HEALING AND BRIDGING,
LLC dba PSYCHEDELIC THERAPY
JOURNEY; a limited liability company;

Plaintiffs,

vs.

UTAH COUNTY, a political subdivision,
PROVO CITY, a political subdivision;
JEFFREY GRAY, an individual;

Defendants.

**AFFIDAVIT OF TANNER J. BEAN IN
SUPPORT OF PLAINTIFFS' MOTION
FOR ATTORNEY FEES REGARDING
ORDER GRANTING MOTION FOR
PRELIMINARY INJUNCTION**

Civil No. 2:24-cv-00887-JNP

Judge Jill N. Parrish

(Removed from Fourth Judicial District
Court, Utah County, State of Utah, Case No.
240406123)

Tanner J. Bean, being duly sworn upon his oath, deposes and states:

1. I am an attorney duly licensed and in good standing with the Utah State Bar and practicing law in the State of Utah since August 15, 2019. I am also duly licensed and in good standing with the Idaho State Bar and have practiced there since October 5, 2017. I am a shareholder at the law firm of Fabian VanCott, who represents Plaintiffs Bridger Lee Jensen,

Singularism, and Psyche Healing and Bridging, LLC (“Singularism”) in the above-captioned action. Although much of my law practice focuses on labor and employment litigation and appeals, I am one of few attorneys in the State of Utah that has significant understanding of the unique area of religious freedom law and defense of religious free exercise rights under state and federal statutory and constitutional frameworks. I am over 18 years of age and have personal knowledge of the facts stated herein.

2. This affidavit is made pursuant to Federal Rule of Civil Procedure 54, DUCivR 54-1, and Utah Code § 63G-33-201(6).

3. I have reviewed the time entries for Anna Christiansen, Jacqueline Rosen, Abigail Gates, Tre Leonard, and Kara Nielson, and myself and billing records for the legal services rendered and expenditures made on behalf of Singularism for work completed in connection with Singularism’s Motion for Temporary Restraining Order and Preliminary Injunction (the “Motion”).

4. Fabian VanCott’s standard billing procedure is that each lawyer, paralegal, and other professional staff member submits detailed time records he or she maintains on a daily basis. Each individual submitting time records is assigned an hourly billing rate that comports with the market and is a fair reflection of his or her knowledge, skill, and experience. Time records are entered into a computer system that generates a “pre-bill” describing all the professional work performed on a client matter as well as disbursements made on behalf of the matter. The pre-bill is then reviewed and, in some cases, time spent on certain tasks is written off or reduced.

5. I am generally familiar with the billing rates charged by attorneys with various levels of experience and expertise within various districts and communities in Utah where I have practiced.

6. As a shareholder attorney who has been practicing in Utah for over five years and as a practicing attorney for over seven years, my rate of \$320 an hour is consistent with, or below, the rates customarily charged for litigation services in the Salt Lake legal market with those of similar levels of skill and the unique experience required by religious free exercise cases. Indeed, that rate is discounted from my typical rate during 2024, which was \$360 an hour, as well as my typical rate in 2025, which is \$385 an hour.

7. Based upon my familiarity and my own experience, it is my opinion that the hourly rates charged to Singularism for Fabian VanCott's services in this matter are fair and reasonable within this legal market, and that the amount of time Fabian VanCott spent and the services Fabian VanCott performed were reasonable and necessary.

8. Based upon my familiarity and my own experience, it is my opinion that all the tasks described in this Affidavit and the exhibits attached hereto were necessary and reasonable in connection with Fabian VanCott's representation of Singularism in this action as related to the Motion. Tasks related to other motions or other work performed for Singularism related to this case have been excluded from the attached exhibits (for example, the preparation of Singularism's Complaint and Amended Complaint, preparation of Singularism's Motion for Anti-Suit Injunction, and opposition of Defendants' Motion to Dismiss).

9. After reviewing the billing records and based on my familiarity with the professionals' practices, I can attest that Fabian VanCott professionals kept contemporaneous time

records when they worked on this matter. To my knowledge, they carefully and accurately recorded the time worked and did not bill any time that was not efficiently spent. Based upon my review, the billing records indicate that they were careful not to duplicate the efforts of other legal professionals.

10. Upon review of the time and billing records for the legal services rendered, they were necessary and reasonable. As detailed below and in the exhibit attached hereto, Singularism requests **\$99,396.00** in attorney fees.

11. In accordance with Federal Rule of Civil Procedure 54, DUCivR 54-1, and Utah Code § 63G-33-201(6), I state as follows:

- a. The basis for the award. As described in Singularism's Motion for Attorney Fees Regarding Order Granting Motion for Preliminary Injunction, the basis for the award is the Court's granting of the Motion, both in its TRO and preliminary injunction order. Utah's Religious Freedom Restoration Act awards damages for prevailing plaintiffs against governmental entities. *See* Utah Code § 63G-33-201(6).
- b. Reasonably detailed description of the time spent and work performed, including for each item of work the name, position, and hourly rate of the persons who performed the work.
 - i. I, Tanner J. Bean, am a shareholder attorney at the law firm of Fabian VanCott, and my hourly rate for this matter is \$320.00. I spent **201.8** hours of time on tasks related to the Motion. As the lead attorney on this matter, I coordinated research and drafting efforts with associate attorneys Anna

Christiansen, Jacqueline Rosen, Abigail Gates, and Tre Leonard, and other work by legal assistant, Kara Nielson. I took the lead drafting, finalizing, and coordinating the filing of the Motion and associated briefs. I also drafted Singularism's Motion for Attorney Fees Regarding Order Granting Motion for Preliminary Injunction and prepared supporting exhibits.

- ii. Anna Christiansen was an associate attorney at the law firm of Fabian VanCott through January 2025, who was admitted to practice law in Utah in September, 2020, and her hourly rate for this matter in 2024 was \$280, and in 2025, \$300 an hour. She spent **43.9** hours of her time on tasks related to the Motion. Ms. Christiansen's role was to research matters related to the Motion, review evidence, and draft portions of briefs.
- iii. Jacqueline Rosen is an associate attorney at the law firm of Fabian VanCott, who was admitted to practice law in Utah in October, 2022, and her hourly rate for this matter in 2024 was \$240, and in 2025, \$260 an hour. She spent **35.8** hours of her time on tasks related to the Motion. Ms. Rosen's role was to research matters related to the Motion, review evidence, and draft portions of briefs.
- iv. Abigail Gates is an associate attorney at the law firm of Fabian VanCott, who was admitted to practice law in Utah in October, 2023, and her hourly rate for this matter in 2024 was \$230, and in 2025, \$250 an hour. She spent **15.2** hours of her time on tasks related to the Motion. Ms. Gates' role was

to research matters related to the Motion, review evidence, and draft portions of briefs.

v. Tre' Leonard is an associate attorney at the law firm of Fabian VanCott, who was admitted to practice law in Utah in October, 2023, and his hourly rate for this matter in 2024 was \$230, and in 2025, \$250 an hour. He spent 7.1 hours of his time on tasks related to the Motion. Mr. Leonard's role was to research matters related to the Motion.

vi. Kara Nielson is a legal assistant at the law firm of Fabian VanCott, whose hourly rate for this matter in 2024 was \$110, and in 2025, \$120 an hour. She spent 7.5 hours of her time on tasks related to the Motion. Ms. Nielson's role was to prepare exhibits, file pleadings, and support hearing preparation.

c. Factors showing the reasonableness of the fees. Based on the factors identified in *Stenson v. Edmonds*, 86 F.4th 870, 879 (10th Cir. 2023), *Prisbrey v. State Auto Ins. Companies*, No. 4:21-CV-00124-DN, 2024 WL 476654, at *1 (D. Utah Feb. 7, 2024), and *John Bean Techs. Corp. v. B GSE Grp., LLC*, No. 1:17-CV-00142-RJS, 2023 WL 6164322, at *18 (D. Utah Sept. 21, 2023), I state as follows:

i. Whether the tasks being billed would normally be billed to a paying client:

All the tasks shown in the attached billing report are those that have actually been billed, or will be billed, to Singularism. They are the normal sort of tasks that are required to prepare for, research, draft, and submit a motion for temporary restraining order and preliminary injunction. Time entries

that are redacted are redacted for the protection of the attorney-client privilege.

- ii. The number of hours spent on each task: **311.3** hours total were spent to fully brief, argue, and obtain relief under the Motion. A substantial portion of those hours were devoted to research, review of evidence, coordinating testimony, drafting briefs, and preparing for and attending hearings under the Motion. All considered, this is a reasonable amount of time to prepare for a Motion as consequential as Singularism's was, especially given the expedited nature of the proceeding and related briefing.
- iii. The complexity of the case: Substantial research was required to draft Singularism's briefs given the unique intersection of religious free exercise claims, controlled substances laws, a newly enacted statute, as well as the intersection of simultaneous civil and criminal proceedings. Additionally, the expedited nature of briefing amid the various other expedited proceedings in this case contributed to the complexity of completing tasks related to the Motion.
- iv. The number of reasonable strategies pursued: Singularism pursued a straightforward strategy of obtaining immediately needed relief by filing the Motion. As described below, the straightforward nature of the proceeding was largely disrupted by Defendants' actions.
- v. The responses necessitated by the maneuvering of the other side: Defendants' maneuverings necessitated significant additional work by

Singularism's attorneys, including revising and refileing the Motion after Defendants' removal to this Court, responding to overlength briefs, responding to Defendants' request for supplemental briefing, responding, on a highly expedited basis, to Defendants' request for expedited discovery in order to oppose the Motion, responding to Defendant's motion for a stay of the Court's TRO order, and tailoring arguments to address Defendant's pursuit of criminal charges against Mr. Jensen following the Court's TRO order.

vi. Potential duplication of services by multiple lawyers: Singularism's attorneys coordinated the performance of distinct tasks with one another. Although some conferencing was required to process the findings of other attorneys' research and drafting, such was minimal. Singularism's attorneys incorporated the research findings of others into briefing, which was predominantly drafted by one attorney.

d. The amount of attorney fees previously awarded. No attorney fees or costs have been previously awarded to Plaintiffs in this case.

12. Based on the basis of the award, description of the time spent, work performed, and reasonableness of the fees, **\$99,396.00** is a reasonable fee for the work necessarily performed by Fabian VanCott in order to bring and prevail on the Motion.

13. If called to testify at a hearing on attorney fees, I would testify to the foregoing information. I would provide the Court with an updated total of attorney fees and costs and other

expenses actually and reasonably incurred since the filing of this Affidavit through testimony and an exhibit that I would bring to Court.

DATED this 21st day of February, 2025.

/s/ Tanner J. Bean

TANNER J. BEAN, Utah Bar No. 17128

EXHIBIT A

Time Report

Jensen, Bridger Lee / Religious Exemption Defense (35523-3) - Billing Entries Related to Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction

Date	Name	Description	Hrs	Amt	Rate	Narrative
11/12/2024	Bean, Tanner J.	Shareholder	2.00	\$640.00	320.00	Draft argument section for use in litigation; review temporary restraining order research; hold call with client to discuss the same and religious exemption defense strategy
11/13/2024	Gates, Abigail	Associate	0.70	\$161.00	230.00	Conference with various parties regarding injunction strategy
11/13/2024	Christiansen, Anna P.	Associate	0.60	\$168.00	280.00	Phone call with T. J. Bean discussing preliminary injunction, federal versus state court, and first amendment case examples
11/13/2024	Bean, Tanner J.	Shareholder	2.5	\$800.00	320.00	Hold calls with client, review additional client documentation; hold call with A. Christiansen
11/14/2024	Bean, Tanner J.	Shareholder	4.1	\$1,088.00	320.00	Begin drafting motion for temporary restraining order and preliminary injunction; hold calls with client
11/15/2024	Bean, Tanner J.	Shareholder	8.4	\$2,688.00	320.00	Complete first draft of motion for temporary restraining order
11/16/2024	Bean, Tanner J.	Shareholder	0.5	\$160.00	320.00	Hold call with client; email client team regarding document gathering for motion for TRO and PI; email K. Nielson regarding various tasks
11/18/2024	Rosen, Jacqueline M.	Associate	0.7	\$168.00	240.00	Revise motion for temporary restraining order
11/18/2024	Gates, Abigail	Associate	1.5	\$480.00	230.00	Review and edit motion for TRO; conference with T. J. Bean regarding same

11/18/2024	Bean, Tanner J.	Shareholder	5.2	\$1,664.00	320.00	Review motion for leave to file overlength motion and related request to submit and proposed order; communicate with A. Gates, J. Rosen, and A. Christiansen regarding their edits and strategy regarding motion for temporary restraining order and preliminary injunction; email with client; participate in client board meeting explaining motion for preliminary injunction; revise declarations in support of motion for temporary restraining order and preliminary injunction; hold additional call with client
11/19/2024	Rosen, Jacqueline M.	Associate	0.8	\$192.00	240.00	Meet regarding filing of temporary restraining order and related documents
11/19/2024	Gates, Abigail	Associate	0.8	\$256.00	230.00	Conference with T. J. Bean, J. M. Rosen, and A. P. Christiansen regarding TRO and bond requirement
11/19/2024	Christiansen, Anna P.	Associate	1.4	\$392.00	280.00	Review preliminary injunction; attend meeting with T. J. Bean, J. M. Rosen, and A. G. Gates discussing strategy and issues related to motion for temporary restraining order; review motion for temporary restraining order and preliminary injunction
11/19/2024	Bean, Tanner J.	Shareholder	8.7	\$2,784.00	320.00	Communicate with client and various client representatives and witnesses; evaluate various documents from client; coordinate finalization of various witness declarations; hold strategy discussions with A. Christiansen, A. Gates, and J. M. Rosen; finalize motion for temporary restraining order and preliminary injunction; finalize motion for overlength briefing and accompanying documents; organize all exhibits in support of the same; coordinate filing of the same
11/19/2024	Nielson, KaraLynn	Legal Assistant	2.8	\$308.00	110.00	Format and send out declarations for signature; draft motion for overlength TRO, proposed order for overlength, request to submit for overlength; finalize exhibits for motion for TRO; file the same.

11/20/2024	Bean, Tanner J.	Shareholder	1.2	\$384.00	320.00	Communicate with court clerk regarding receipt of motion for temporary restraining order and scheduling of hearing; communicate with client regarding the same; draft proposed order regarding motion for temporary restraining order
11/21/2024	Bean, Tanner J.	Shareholder	0.20	\$64.00	320.00	Email with court regarding motion for temporary restraining order; email client regarding the same
11/22/2024	Bean, Tanner J.	Shareholder	0.10	\$32.00	320.00	Communicate with client regarding updates from the court regarding motion for temporary restraining order
11/25/2024	Bean, Tanner J.	Shareholder	1.1	\$352.00	320.00	Email court clerk regarding briefing scheduling; hold call with client to discuss various issues
11/26/2024	Bean, Tanner J.	Shareholder	0.2	\$64.00	320.00	Communicate with client regarding GRAMA requests and other questions in support of motion for TRO/PI
12/02/2024	Bean, Tanner J.	Shareholder	3.9	\$1,248.00	320.00	Review Court's order setting temporary restraining order/preliminary injunction briefing schedule; email regarding the same and other tasks with client; research 10th Circuit legal framework for motion; edit motion for temporary restraining order/preliminary injunction to reflect the same; assign research to J. M. Rosen; assign review task to A. Christiansen; assign other motion redrafting to K. Nielson; hold call with client regarding case updates; revise client's GRAMMA request language
12/03/2024	Rosen, Jacqueline M.	Associate	0.70	\$168.00	240.00	Research state RFRA interpretation
12/03/2024	Christiansen, Anna P.	Associate	2.00	\$560.00	280.00	Review motion for temporary restraining order in preparation for filing, including review of T. J. Bean's edits, make minor clarifying edits and citation corrections; phone call with T. J. Bean discussing plans for preparing reply in support of motion for temporary restraining order and oral arguments

12/03/2024	Bean, Tanner J.	Shareholder	2	\$640.00	320.00	Edit, finalize, and coordinate filing of motion for overlength briefing for motion for temporary restraining order and preliminary injunction; email opposing counsel regarding the same; communicate otherwise with client; hold strategy call with A. Christiansen
12/03/2024	Nielson, KaraLynn	Legal Assistant	0.50	\$55.00	110.00	Format stipulated motion for overlength motion for TRO and proposed order, to federal standards; file documents
12/04/2024	Bean, Tanner J.	Shareholder	1.3	\$416.00	320.00	Review grant of overlength briefing; finalize motion for temporary restraining order and preliminary injunction for re-filing
12/04/2024	Nielson, KaraLynn	Legal Assistant	1.00	\$110.00	110.00	Format Motion for TRO and Preliminary Injunction, prepare exhibits, and proposed order; file documents.
12/05/2024	Bean, Tanner J.	Shareholder	0.20	\$64.00	320.00	Communicate with client and witnesses regarding miscellaneous hearing preparation issues
12/06/2024	Christiansen, Anna P.	Associate	4.20	\$1,176.00	280.00	Review exhibits to motion for temporary restraining order, especially witness declarations; draft outline of interview questions for meeting with witnesses; phone calls with witnesses asking interview questions regarding experience with Singularism and discussing procedure to expect
12/06/2024	Bean, Tanner J.	Shareholder	0.70	\$224.00	320.00	Review and revise A. Christiansen's witness interview questionnaire; discuss the same with A. Christiansen; communicate with client regarding miscellaneous; coordinate witness preparation interviews
12/09/2024	Christiansen, Anna P.	Associate	0.5	\$140.00	280.00	Meeting with T. J. Bean debriefing regarding our respective interviews with witnesses and discussing plans for preparing for TRO hearing

						Prepare for and hold two witness preparation calls; review and revise form motion for overlength briefing and reply brief; gather documentation for potential use at temporary restraining order/preliminary injunction hearing; analyze opposition to motion for temporary restraining order/preliminary injunction; assign out research assignment to team members; draft preliminary reply brief outline; hold call with client to discuss opposition brief; email client regarding needed documentation and remaining witness interviews
12/09/2024	Bean, Tanner J.	Shareholder	8.9	\$2,848.00	320.00	
12/10/2024	Rosen, Jacqueline M.	Associate	11.2	\$2,688.00	240.00	Research religious sincerity, irreparable harm, and cases regarding religious exemptions to controlled substances act
12/10/2024	Gates, Abigail	Associate	5.40	\$1,242.00	230.00	Review and analyze sources cited in Defendant's Opposition; research case law regarding religious exemption for controlled substances
12/10/2024	Christiansen, Anna P.	Associate	3.00	\$840.00	280.00	Review opposition to motion for temporary restraining order; research case law regarding appropriate amounts for rule 65(c) security bond
12/10/2024	Leonard, Tre D.	Associate	3.00	\$690.00	230.00	Research in furtherance of aiding the drafting of reply brief
12/10/2024	Bean, Tanner J.	Shareholder	13.40	\$4,288.00	320.00	Draft reply brief in support of motion for temporary restraining order/preliminary injunction; hold witness interviews; review notes submitted from client on opposition; hold calls with client to discuss opposition; review client's drafted testimonials for use in supplemental declaration; review research from hearing team; discuss research with members of hearing team
12/11/2024	Rosen, Jacqueline M.	Associate	5.00	\$1,200.00	240.00	Research case law cited by defendants
12/11/2024	Gates, Abigail	Associate	3.50	\$805.00	230.00	Review reply to opposition; draft section responding to sources cited by defendants; research cases cited by defendants

12/11/2024	Christiansen, Anna P.	Associate	8.30	\$2,324.00	280.00	Phone call with T. J. Bean discussing plan for finalizing materials for reply in support of motion for temporary restraining order and preparing for hearing; prepare supplemental declaration of Bridger Jensen: consolidate statements into a single declaration; draft portion of argument section in brief
12/11/2024	Leonard, Tre D.	Associate	2.00	\$460.00	230.00	Research in furtherance of drafting reply brief and preparing for oral arguments
12/11/2024	Bean, Tanner J.	Shareholder	11.20	\$3,584.00	320.00	Continue drafting reply brief in support of temporary restraining order/preliminary injunction motion; hold conversations with client regarding the same; hold conversation with potential witness; hold conversations with team regarding the same; review research regarding the same; coordinate filing the same
12/11/2024	Nielson, KaraLynn	Legal Assistant	2.00	\$220.00	110.00	Prepare exhibits, finalize, file reply in support of motion for TRO and preliminary injunction
12/12/2024	Christiansen, Anna P.	Associate	5.40	\$1,512.00	280.00	Phone interview with witnesses; phone calls with T. J. Bean discussing strategy and plan of action to prepare for tomorrow's hearing; attend Teams meeting with client and T. J. Bean preparing to tomorrow's hearing; outline direct exam questions for witnesses; phone call with witness regarding testifying at temporary restraining order hearing

						Prepare for temporary restraining order and preliminary injunction hearing; draft examination outlines for witnesses; review and revise examination outlines for three additional witnesses; hold call with witness regarding potential testimony; coordinate communication with all witnesses; hold two calls with client; review and format additional documents for use in hearing; communicate with opposing counsel regarding witnesses and potential stipulation; draft points for potential stipulation
12/12/2024	Bean, Tanner J.	Shareholder	14.30	\$4,576.00	320.00	
12/13/2024	Rosen, Jacqueline M.	Associate	0.20	\$48.00	240.00	Pull case law during temporary restraining order hearing
12/13/2024	Gates, Abigail	Associate	1.00	\$230.00	230.00	Research case law cited by defendants during hearing
12/13/2024	Christiansen, Anna P.	Associate	10.50	\$2,940.00	280.00	Review reply in support of motion for temporary restraining order; attend hearing on plaintiffs' motion for temporary restraining order
12/13/2024	Bean, Tanner J.	Shareholder	11.30	\$3,616.00	320.00	Draft oral argument outline; hold call with opposing counsel regarding witness presentation; communicate with witnesses regarding hearing testimony; print critical cases for presentation at hearing; hold call with client; otherwise prepare for temporary restraining order hearing; participate in temporary restraining order hearing; strategize with A. Christiansen regarding newly adduced authority and documents from Defendants during temporary restraining order hearing; explain results of Court's temporary restraining order to clients; discuss with clients next steps

12/16/2024	Christiansen, Anna P.	Associate	0.30	\$84.00	280.00	Review emails from T. J. Bean addressing loose ends following temporary restraining order hearing and respond including providing notes of court's order and notes regarding exhibits that were introduced and need to be filed with the court
12/16/2024	Bean, Tanner J.	Shareholder	3.2	\$1,024.00	320.00	Review various court orders and docket entries regarding results of temporary restraining order hearing; draft and send email to opposing counsel regarding the same; hold call with client regarding temporary restraining order decision
12/16/2024	Nielson, KaraLynn	Legal Assistant	0.50	\$55.00	110.00	Prep new exhibits from hearing, draft cover letter, file letter/exhibits
12/18/2024	Bean, Tanner J.	Shareholder	4.6	\$1,472.00	320.00	Hold call with client regarding communications to opposing counsel regarding return of items in TRO and scheduling; finalize and convey the same to opposing counsel by email; review motion for stay or modification of TRO; discuss drafting of opposition to the same with A. P. Christiansen and J. M. Rosen; begin research and drafting for the same
12/19/2024	Rosen, Jacqueline M.	Associate	2.6	\$624.00	240.00	Draft portion of opposition to motion to stay regarding same
12/19/2024	Bean, Tanner J.	Shareholder	3.8	\$1,216.00	320.00	Finalize opposition to motion for stay of temporary restraining order; finalize status report and request for hearing; hold calls with client to discuss the same; hold strategy and drafting discussions with J. M. Rosen and A. P. Christiansen; review and respond to client emails regarding GRAMMA requests
12/20/2024	Bean, Tanner J.	Shareholder	0.1	\$32.00	320.00	Review request for five-day preliminary injunction hearing
12/21/2024	Bean, Tanner J.	Shareholder	1	\$320.00	320.00	Review previous filings; review caselaw and email client and counsel regarding the same
01/02/2025	Bean, Tanner J.	Shareholder	0.9	\$288.00	320.00	Hold call with client to discuss case progress and strategy

01/03/2025	Bean, Tanner J.	Shareholder	1.1	\$352.00	320.00	Hold call with client; review reply in support of motion for stay of temporary restraining order; discuss the same with J. M. Rosen
01/06/2025	Bean, Tanner J.	Shareholder	0.6	\$192.00	320.00	Hold call with client to discuss points of strategy; coordinate import of evidence from criminal case for use in support of motion for preliminary injunction
01/07/2025	Bean, Tanner J.	Shareholder	1	\$320.00	320.00	Review Court's order granting partial stay of temporary restraining order; discuss the same with A. Christiansen and J. M. Rosen; email client regarding the same; hold calls with client to discuss the same
01/09/2025	Christiansen, Anna P.	Associate	0.4	\$128.00	280.00	Conference with T. J. Bean and J. M. Rosen debriefing following T. J. Bean's preliminary injunction conference with defendants preparations for preliminary injunction hearing
01/09/2025	Bean, Tanner J.	Shareholder	0.4	\$128.00	320.00	Hold call with opposing counsel to discuss upcoming hearing
01/14/2025	Bean, Tanner J.	Shareholder	0.50	\$160.00	320.00	Hold call with client regarding preliminary hearing strategy and business license issue; begin review of criminal case discovery for use in civil case
01/14/2025	Rosen, Jacqueline M.	Associate	0.1	\$26.00	260.00	Discuss upcoming hearing with T. J. Bean
01/15/2025	Bean, Tanner J.	Shareholder	0.2	\$64.00	320.00	Communicate with opposing counsel regarding preliminary injunction hearing items
01/15/2025	Leonard, Tre D.	Associate	1.10	\$275.00	250.00	Research statute and case law regarding awards of attorney fees in furtherance of drafting demand
01/16/2025	Christiansen, Anna P.	Associate	0.70	\$210.00	300.00	Meeting with T. J. Bean discussing recent developments in case including proposals from defendants' regarding conduct of hearing at upcoming hearing

						In preparation of preliminary injunction hearing; complete review of criminal discovery materials; review Provo City business licensure correspondence form; review temporary restraining order hearing transcript; review all documents previously submitted in support of temporary restraining order and preliminary injunction from both parties; hold call with opposing counsel regarding preliminary injunction hearing procedure; discuss opposing counsel's procedural offer with J. M. Rosen and A. Christiansen; hold calls with client
01/16/2025	Bean, Tanner J.	Shareholder	8.00	\$2,560.00	320.00	
01/16/2025	Rosen, Jacqueline M.	Associate	0.20	\$52.00	260.00	Discuss preliminary injunction hearing strategy with T. J. Bean; review business license
01/17/2025	Christiansen, Anna P.	Associate	1.10	\$330.00	300.00	Research regarding possible defense witness; phone call with T. J. Bean regarding updates case and strategic planning for preliminary injunction hearing; review T. J. Bean draft email to opposing counsel regarding proposals for stipulations regarding hearing and next steps in case; phone call with T. J. Bean and J. M. Rosen
01/17/2025	Bean, Tanner J.	Shareholder	4.20	\$1,344.00	320.00	Draft email to opposing counsel regarding preliminary hearing evidence stipulation, additional evidence, proposed fact stipulation points, and motion for leave to amend complaint; review and revise the same with A. Christiansen and J. M. Rosen; review Defendants' motion for supplemental briefing and attached supplemental briefing; review Court's order permitting the same and permitting Plaintiffs' supplemental briefing; hold call with client to discuss all of the same
01/17/2025	Rosen, Jacqueline M.	Associate	0.20	\$52.00	260.00	Review proposal to opposing counsel, Defendants' motion to file supplemental memorandum

01/20/2025	Bean, Tanner J.	Shareholder	9.1	\$2,912.00	320.00	Draft supplemental brief in support of motion for preliminary injunction; discuss with client obtaining declaration of witness in support of the same; email the same to A. Christiansen and J. M. Rosen for review
01/21/2025	Christiansen, Anna P.	Associate	1.6	\$480.00	300.00	Attend team meeting with T. J. Bean and J. M. Rosen discussing preparations for hearing on plaintiffs' motion for preliminary injunction review draft supplemental briefing in support of motion for preliminary injunction and mark up with comments and minor corrections; review newly produced evidence
01/21/2025	Bean, Tanner J.	Shareholder	7.2	\$2,304.00	320.00	Continue drafting supplemental brief in support of motion for preliminary injunction; hold call with counsel to discuss hearing stipulation; finalize stipulation; revise client's supplemental declaration; review evidence from Defendants; hold calls with client regarding various related issues
01/21/2025	Rosen, Jacqueline M.	Associate	3.50	\$910.00	260.00	Revise supplemental brief in support of motion for preliminary injunction; discuss hearing strategy with T. J. Bean, A. P. Christiansen; review additional production from Defendants; research hearsay exceptions
01/21/2025	Gates, Abigail	Associate	2.30	\$575.00	250.00	Review sources cited in Defendant's supplemental brief and draft portion of response regarding same
01/22/2025	Nielson, KaraLynn	Legal Assistant	0.6	\$72.00	120.00	Prepare supplemental brief exhibits; finalize and file supplemental brief in support of motion for TRO
01/22/2025	Christiansen, Anna P.	Associate	1.1	\$330.00	300.00	Review and markup proposed order; review supplemental declaration of Bridger Jensen; attend team meeting with T. J. Bean and J. M. Rosen discussing preparations and strategy for tomorrow's hearing regarding motion for preliminary injunction

01/22/2025	Bean, Tanner J.	Shareholder	12.7	\$4,064.00	320.00	Prepare for preliminary injunction hearing; hold calls with client in preparation for the same; finalize client's declaration; finalize supplemental brief in support of preliminary injunction; finalize documents stipulation between counsel; coordinate filing of the same; outline argument outline for preliminary injunction hearing; review evidence in preparation for preliminary injunction hearing
01/22/2025	Rosen, Jacqueline M.	Associate	4.20	\$1,092.00	260.00	Revise filings in advance of preliminary injunction hearing and prepare for hearing with A. P. Christiansen and T. J. Bean
01/23/2025	Christiansen, Anna P.	Associate	2.8	\$840.00	300.00	Attend hearing regarding and motion for preliminary injunction (1/3 time)
01/23/2025	Bean, Tanner J.	Shareholder	3.4	\$1,088.00	320.00	Prepare for preliminary injunction hearing; attend and argue motion for preliminary injunction (1/3 time)
01/23/2025	Rosen, Jacqueline M.	Associate	2.7	\$702.00	260.00	Prepare for and participate in hearing regarding motion for preliminary injunction (1/3 time)
01/27/2025	Bean, Tanner J.	Shareholder	1.30	\$416.00	320.00	Review and analyze supplemental briefing and evidence order; hold call with J. M. Rosen to discuss the same; hold call with client to discuss the same; begin outlining supplemental briefing arguments
01/27/2025	Bean, Tanner J.	Shareholder	0.90	\$288.00	320.00	Discuss research questions for supplemental briefing in support of preliminary injunction with J. M. Rosen; assign research project regarding the same to T. Leonard; hold call with client regarding preparation of supplemental declaration in support of the same
01/27/2025	Rosen, Jacqueline M.	Associate	0.10	\$26.00	260.00	Discuss supplemental briefing with T. J. Bean
01/27/2025	Nielson, KaraLynn	Legal Assistant	0.10	\$12.00	120.00	Prep and file request for hearing transcript
01/27/2025	Leonard, Tre D.	Associate	1.00	\$250.00	250.00	Review case law and Oregon CSA in furtherance of developing defense for case

01/28/2025	Bean, Tanner J.	Shareholder	0.10	\$32.00	320.00	Review T. Leonard's Oregon controlled substance act research; email regarding the same
01/29/2025	Bean, Tanner J.	Shareholder	0.10	\$32.00	320.00	Review emails from client regarding January filings
01/30/2025	Bean, Tanner J.	Shareholder	9.00	\$2,880.00	320.00	Research issues related to supplemental briefing in support of motion for preliminary injunction; draft first issue ordered in supplemental briefing; hold call with client to discuss the same
01/31/2025	Bean, Tanner J.	Shareholder	0.9	\$288.00	320.00	Discuss progress of supplemental briefing with J. M. Rosen; communicate with client regarding the same
01/31/2025	Rosen, Jacqueline M.	Associate	1.10	\$286.00	260.00	Discuss supplemental briefing with T. J. Bean; revise briefing regarding applicability of Smith
02/03/2025	Bean, Tanner J.	Shareholder	6.60	\$2,112.00	320.00	Continue drafting and editing second supplemental brief in support of motion for temporary restraining order and preliminary injunction; begin draft of declaration in support of the same; hold call with client to discuss the same
02/04/2025	Rosen, Jacqueline M.	Associate	1.3	\$338.00	260.00	Review and analyze transcripts regarding witness
02/04/2025	Bean, Tanner J.	Shareholder	6.50	\$2,080.00	320.00	Continue drafting supplemental brief in support of motion for preliminary injunction; continue drafting declaration in support of the same; review evidence and testimony submitted in support of the same; review client's edits and suggestions on the same; hold call with opposing counsel regarding additional evidence submissions in conjunction with supplemental briefing

02/05/2025	Bean, Tanner J.	Shareholder	4.50	\$1,440.00	320.00	Hold call with opposing counsel regarding evidentiary submissions with supplemental briefing; discuss content of Defendant's additional evidentiary submissions with J. M. Rosen; finalize supplemental briefing and exhibits and declaration in support of the same; hold calls with client regarding the same; coordinate filing of supplemental brief and additional evidence in support of motion for preliminary injunction
02/20/2025	Rosen, Jacqueline M.	Associate	1.20	\$312.00	260.00	Review and analyze preliminary injunction decision; discuss same with client
02/20/2025	Bean, Tanner J.	Shareholder	5.40	\$1,728.00	320.00	Review and analyze Court's order granting preliminary injunction; hold call to review the same with client; begin preparing motion for attorney fees regarding the same
2/21/2025	Bean, Tanner J.	Shareholder	3.1	\$992.00	320.00	Finalize and coordinate filing of motion for attorney fees regarding order granting preliminary injunction

311.30 \$91,946.00

EXHIBIT B

Time Report

Jensen, Bridger Lee / Religious Exemption Defense (35523-3) - Billing Entries Related to Defendants' Motion for Expedited Discovery

Date	Name	Description	Hrs	Amt	Rate	Narrative
12/20/2024	Christiansen, Anna P.	Associate	1.60	\$448.00	\$280.00	Review motion for expedited discovery; review defendants' written discovery requests; research church autonomy doctrine and other case law in support of limiting defendants' written discovery requests
12/20/2024	Bean, Tanner J.	Shareholder	1.60	\$512.00	\$320.00	Review Defendants' motion for expedited discovery and discovery requests; discuss regarding the same with client
12/21/2024	Rosen, Jacqueline M.	Associate	5.00	\$1,200.00	\$240.00	Research for opposition to motion for expedited discovery; revise same
12/21/2024	Bean, Tanner J.	Shareholder	4.90	\$1,568.00	\$320.00	Review previous filings in preparation for drafting opposition to expedited discovery motion; strategize research questions with J. M. Rosen; hold call with client; draft opposition to request for expedited discovery
12/22/2024	Christiansen, Anna P.	Associate	1.30	\$364.00	\$280.00	Review opposition to motion for expedited discovery and email T. J. Bean and J. M. Rosen regarding ideas for developing arguments regarding purpose of discovery
12/23/2024	Bean, Tanner J.	Shareholder	1.70	\$544.00	\$320.00	Finalize and coordinate filing for opposition to motion for expedited discovery; hold call with client board members regarding the same
12/30/2024	Christiansen, Anna P.	Associate	0.30	\$84.00	\$280.00	Review defendants' reply in support of motion for expedited discovery
12/30/2024	Bean, Tanner J.	Shareholder	0.30	\$96.00	\$320.00	Review reply in support of motion for expedited discovery; review text of other docket text entries; hold call with S. Pitcher regarding criminal case and civil discovery requests

01/07/2025	Bean, Tanner J.	Shareholder	1.40	\$448.00	\$320.00	Review Court's order denying expedited discovery; review Court's entry of protective order; discuss the same with A. Christiansen and J. M. Rosen; email client and criminal counsel regarding the same; hold two calls with client to discuss the same
01/13/2025	Bean, Tanner J.	Shareholder	5.50	\$1,760.00	\$320.00	Draft motion for attorney fees and affidavit in support regarding denial of Defendants' motion for expedited discovery
01/13/2025	Rosen, Jacqueline M.	Associate	0.20	\$52.00	\$260.00	Revise motion for attorney fees and affidavit in support
01/14/2025	Christiansen, Anna P.	Associate	0.50	\$150.00	\$300.00	Review and edit spreadsheet for attorney fees on defendants' motion for expedited discovery; review affidavit in support of motion for attorney fees in opposing defendants' motion for expedited discovery and edit portions relating to my experience and time entries; review motion related to same
01/14/2025	Bean, Tanner J.	Shareholder	0.70	\$224.00	\$320.00	Finalize and coordinate filing of motion for attorney fees regarding Defendants' motion for expedited discovery

25.00 \$7,450.00